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Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

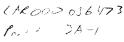
- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- Valuables, please consider Insured or Registered Mail.

 For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS_® postmark on your Certified Mail receipt is required.

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

CERTIFIED MAIL NO. 7007-2560-0001-7660-6009 RETURN RECEIPT REQUESTED

AUG 3 0 2010

Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act

Henry Richards
Henry's Medical Xray Service
480 Collins Ave.
Colma, CA 94014
EPA Identification Number: CAR000056473

Dear Mr. Richards:

The purpose of this letter is to direct you or another duly authorized representative of Henry's Medical Xray Service to respond in writing to this request for information resulting from a hazardous waste compliance inspection conducted at your facility on August 23, 2010 by a United States Environmental Protection Agency inspection team ("EPA").

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA") {42 U.S.C. § 6927(a)}, the EPA may require persons subject to RCRA to furnish information necessary for the EPA to administer the Act. Pursuant to the EPA's authority set forth in Section 3007(a), you are required to submit the following information to the EPA:

Please provide EPA with a copy of Henry's Medical Xray Service's list of customers for the period ranging from January 1, 2008 to the present. Please include each customer's name, address and, if applicable, EPA Identification Number.

Section 3008 of RCRA {42 U.S.C. § 6928}, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within 14 calendar days from the date of

your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§ 3502(3), 3507, 3512, and 3518(c)(1) {5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a)}. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons {44 U.S.C. § 3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a)}.

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to the EPA within 21 calendar days from the date of your receipt of this letter. Please address the submittal to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you have any questions regarding this letter, please contact Clint Seiter of my staff at (415) 972-3298. Your cooperation in this matter is appreciated.

Sincerely,

Amy Miller, Manager

RCRA Enforcement Office

cc: Charles McLaughlin, DTSC

Estuardo Montufar, San Mateo County Environmental Health

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A Show Cause signature routing package (routing slip, letter & attachments) will be prepared by the WST-3 Compliance Officer				Send to WST-3 Office Manager for signature; then to Admin for mail- out (certified mail). Make sure a copy goes to CCs (State, CUPA, etc.)			

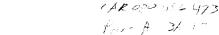
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H.M. RICHARDS @ Att. HEt. HMXRICHARDS@ATT. NET

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California Environmental Protection Agency
Department of Toxic Substances Control



Fact Sheet

Onsite Tiered Permitting: Changes in Regulation of Silver Wastes [as established by Senate Bill (SB) 2111]

Revised - January 2000

This fact sheet summarizes upcoming changes in regulatory requirements for wastes that are hazardous wastes solely due to the presence of silver ("silver-only" hazardous wastes). As a result of changes mandated by SB 2111 (Costa), Chapter 309, Statutes of 1998, many waste treatment activities for "silver-only" hazardous waste will not be regulated after January 1, 1999. The fact sheet primarily addresses onsite generation and treatment of "silver-only" hazardous wastes. For information related to offsite facilities, please contact the Department of Toxic Substances Control (DTSC) (see page 5 for where to contact DTSC). This fact sheet supersedes the previous fact sheet dated August 1999 and is effective from January 2000 to December 2003, unless extended or rescinded.

SUMMARY

SB 2111 mandates that, effective January 1, 1999, "silver-only" hazardous wastes are to be regulated only to the extent they are regulated under the federal Resource Conservation and Recovery Act (RCRA). This change applies to the generation, transportation, and treatment of "silver-only" hazardous wastes. Onsite treatment of photoimaging solutions and wastewaters will no longer be subject to Tiered Permitting authorization requirements. Generators of "silver-only" wastes continue to be considered hazardous waste generators, but they may be eligible for reduced management and transportation requirements. The major provisions of the bill are codified in section 25143.13 of the California Health and Safety Code (HSC) (attached). Applicable RCRA regulations [found in Title 40, Code of Federal Regulations (40 CFR), beginning with Part 260] will apply in California for "silver-only" hazardous wastes until existing regulations are amended. (Since applicable federal regulations will apply until DTSC can amend State regulations, only federal regulatory citations are given here.)

EFFECTIVE DATES

SB 2111 was signed into law on August 17, 1998 as Chapter 309 of the Statutes of 1998. The provisions of the bill went into effect on January 1, 1999.

BACKGROUND

Most of the currently regulated "silver-only" hazardous wastes are generated by the photoprocessing, printing, and dental/medical clinical industries. (Other industries, such as electroplating and electronics, also generate large quantities of silver-bearing wastes but these wastes are typically hazardous for other reasons, in addition to their silver content.) "Silver-only" wastestreams are usually generated in solution form and are treated onsite, or shipped offsite for treatment, to extract the silver. In cases where the solutions are treated onsite, the treated effluent is commonly discharged to a sewer operated by a Publicly Owned Treatment Works (POTW) and the silver-rich treatment residue or sludge is sent offsite for reclamation.

Businesses treating their own wastes onsite are currently regulated under DTSC's Tiered Permitting program, under the Permit by Rule (PBR), Conditional Authorization (CA), or Conditional Exemption (CE) authorization tiers. Certified Unified Program Agencies (CUPAs) are responsible for inspection and enforcement at generator sites and PBR, CA, and CE facilities. CUPAs also process CA, CE and PBR notifications and closures, whereas DTSC processes CA, CE, and PBR notifications and closures in non-CUPA jurisdictions. Most offsite silver recovery facilities are currently regulated by DTSC under the Standardized Permit tier.

WHO IS AFFECTED BY CHANGES?

Businesses that generate "silver-only" hazardous wastes, such as:

Photoprocessors (includes photography, printing, and X-ray development wastes):

Dental offices/clinics

Hospitals

Medical professional offices/clinics

Chiropractic offices

Veterinary hospitals/clinics

Police

Schools with industrial labs

Government agencies

Microfilm labs

Motion picture labs

Minilabs/One-hour photo shops

Professional/photofinishers

Printer, graphic arts, commercial services labs

Jewelers and jewelry manufacturers

Electrical and electronics

Businesses that transport "silver-only" hazardous wastes.

Businesses that reclaim metals from "silver-only" hazardous waste.

Environmental regulatory agencies.

WHAT ARE SOME OF THE IMPORTANT POINTS TO CONSIDER?

• Requirements established under laws other than California's Hazardous Waste Control Law are not affected by the provisions of SB 2111.

Examples of requirements not affected include POTW pretreatment requirements for discharges to the sewer, as well as waste discharge requirements established under the federal Clean Water Act or California's Porter-Cologne Water Quality Control Act.

- "Silver-only" hazardous wastes will be identified as hazardous due to their silver content according to the federal RCRA regulatory level of 5 milligrams/liter (mg/l), using the Toxicity Characteristic Leaching Procedure (TCLP) [40 CFR 261.24].
- If the waste is identified as hazardous for any other reason (i.e., corrosivity, reactivity, ignitability, or listed as hazardous) or constituent (i.e., toxicity characteristic other than silver), using the California hazardous waste criteria, then the waste remains subject to California hazardous waste requirements.
- Changes apply exclusively to wastes that are hazardous for silver only. Wastes that are hazardous for constituents other than silver are not included. Examples of wastes not included are:
 - RCRA listed wastes, such as electroplating wastewater treatment sludges (F006 listed waste);
 - dental amalgam (if it contains mercury or any other metal that would cause it to exhibit a characteristic of hazardous waste); and
 - corrosive cleaning/etching solution wastes (generally hazardous due to corrosivity, as well as other metals).
- Treatment of photoimaging solutions and wastewaters to remove silver will be regulated only to the extent it is regulated under RCRA, and not require California Tiered Permitting authorization. Any other treatment of "silver-only" RCRA hazardous waste remains subject to regulation under California hazardous waste laws and may require treatment authorization.
- Businesses generating no more than 100 kilograms (approximately 27 gallons) per month exclusively of "silver-only" hazardous waste may be exempt from most generator requirements as Conditionally Exempt Small Quantity Generators (CESQGs) [40 CFR 261.5].
- Although subject to reduced waste management requirements, CESQGs must:
 - determine whether their waste is "silver-only" hazardous or not using tests or knowledge of the waste [40 CFR 261.5(g)(1)];

- not accumulate onsite more than 1000 kilograms of waste at any time [40 CFR 261.5(g)(2)].
- ensure that their "silver-only" hazardous waste is either recycled (reclaimed) or disposed at a facility that is permitted or otherwise authorized to manage that hazardous waste [40 CFR 261.5(g)(3)].
- Businesses with a "zero waste count" for purposes of determining their generator category [40 CFR 261.5(c)(2)] are still considered hazardous waste generators (as CESQGs) because they remain subject to some RCRA regulatory requirements and meet the RCRA definition of "generator".
- Sludges generated by the treatment of silver-rich solutions and wastewaters, which are hazardous only for their silver content, are not considered solid waste, and therefore not hazardous waste, when reclaimed [40 CFR 261.2(c)(3)].
- Businesses sending silver sludges for reclamation must be able to provide documentation that the sludges are being reclaimed [40 CFR 261.2(f)]. (Examples of acceptable documentation include contracts with refiners and/or receipts from the sludge transporter for shipments of sludge to a refiner.)
- Silver metal scraps that are recycled will not be subject to regulation as hazardous wastes [40 CFR 261.4(a)(13) and 40 CFR 261.6(a)(3)(ii)].
- Manifests are required for offsite shipments of "silver-only" hazardous wastes, unless the generator is a CESQG, in which case no manifest is required. Manifests are also not required for characteristically hazardous sludges that are reclaimed. These sludges are excluded from being considered a solid and a hazardous waste and are therefore not regulated under RCRA.
- Except for the CESQG requirements, most of the exclusions and exemptions from regulation require that "silver-only" hazardous waste be reclaimed. "Silver-only" hazardous wastes that are not reclaimed may be subject to full regulation under RCRA.

FREQUENTLY ASKED QUESTIONS

Does the passage of SB 2111 mean that silver is no longer regulated as a hazardous waste?

No. Most wastes containing silver above the regulatory threshold will continue to be regulated as hazardous wastes. But "silver-only" hazardous wastes will only be regulated to the extent that they are regulated under the federal RCRA.

Although many of the "silver-only" hazardous wastes will qualify for the reduced management requirements associated with the federal CESQG category or precious metals recovery, the wastes must still be handled in accordance with all applicable requirements. For example, silver-bearing photoprocessing solutions and wastewaters that are discharged to the sewer must comply with POTW discharge limits.

I am currently operating under the onsite tiers of the Tiered Permitting program and treat wastes that are "silver-only" hazardous wastes. What should I do?

If you are treating "silver-only" RCRA-exempt wastestreams or treating photoimaging solutions and wastewaters to remove silver, and are currently operating under the CA, CE, or PBR tiers, you should notify your CUPA in writing that, as of January 1, 1999, your treatment activity is exempt from Tiered Permitting requirements.

Note: For those facilities located in non-CUPA jurisdictions, notifications should be sent to DTSC.

DTSC and the CUPAs are requesting letters from facilities operating under the onsite tiers of the Tiered Permitting program in order to update facility files. While the requested letter is not mandated by SB 2111, facilities are urged to provide the written notification to assure proper identification of regulatory status.

What if only a portion of the hazardous wastes I generate are hazardous solely due to their silver content?

You should notify your CUPA of the portion of the wastes you treat that are hazardous for silver only and are exempt from Tiered Permitting regulation as of January 1, 1999. If your authorized treatment unit treats both "silver-only" and non-silver hazardous wastestreams, you will continue to need authorization under the Tiered Permitting program for the non-silver treatment activity. However, you should still notify your CUPA of the portion of your wastes which are "silver-only" and exempt as of January 1, 1999, because you may be able to operate under a lower tier based on the change in volume of regulated wastestreams.

Do I need to complete any closure activities (such as unit decontamination or certification that a unit has been closed) for any "silver-only" onsite treatment units or wastestreams that are exempt from Tiered Permitting effective January 1, 1999?

No. Treatment activities regulated under the provisions of SB 2111 are exempt from Tiered Permitting requirements, including closure requirements, as of January 1, 1999. You will be able to continue operating without going through closure. However, as stated above, you should notify your CUPA that your treatment unit is exempt pursuant to SB 2111 provisions.

Do I need a letter from my CUPA or DTSC in order to operate under the SB 2111 provisions?

No. However, you should still notify your CUPA to assure proper identification of your regulatory status.

SELECTED DEFINITIONS

Generator: Any person, by site, whose act or process produces hazardous waste identified or listed in 40 CFR Part 261 or whose act first causes a hazardous waste to become subject to regulation [40 CFR 261.10].

By-product: A material that is not one of the primary products of a production process and is not solely or separately produced by the production process [40 CFR 261.1(c)(3)]. Examples of by-products are process residues, such as slags or distillation column bottoms.

Sludge: A solid, semi-solid, or liquid waste generated from a wastewater treatment system or pollution control process [40 CFR 260.10]. (The treated effluent generated in the process is not included in the definition of sludge.) Examples of sludge include sludge generated by silver recovery from photoprocessing solutions using metallic replacement cartridges or electrolysis.

Commercial chemical product: This term refers to both listed and characteristically hazardous chemical substances manufactured or formulated for commercial use [40 CFR 261.33]. The term generally includes commercial chemical products and their intermediates, off-specification species, spill residues, and container residues. The term does not include manufacturing process wastes. Examples of commercial chemical products include silver nitrate and silver chloride chemical products used in photographic processes.

Scrap metal: Bits and pieces of metal parts or metal pieces that may be combined together with bolts or soldering, which when worn or unnecessary can be recycled [40 CFR 261.1(c)(6)]. Examples of scrap metal are silver metal shavings from jewelry manufacturing and metal wire pieces. "Excluded scrap metal" is processed scrap metal and unprocessed turnings, cuttings, punchings, and borings generated by steel mills, foundries, refineries, and metal working/fabrication industries [40 CFR 261.1(c)(9)].

Speculative accumulation: A material is accumulated speculatively if it is accumulated before being recycled. A material is not accumulated speculatively if it can be shown that the material is potentially recyclable, that there is a feasible means for recycling the material, and that 75 percent of the material accumulated on the first of January of any given year is recycled during the same calendar year [40 CFR 261.1(c)(8)].

ADDITIONAL SOURCES OF INFORMATION

The United States Environmental Protection Agency (U.S. EPA), Office of Solid Waste provides a variety of mechanisms for accessing information about management of hazardous waste. To talk with a RCRA regulatory specialist about a specific issue or to order publications, call the U.S. EPA RCRA Hotline at (800) 424-9346, Monday through Friday, 9:00 a.m. to 6:00 p.m., Eastern time. Information is also available on the Internet at http://www.epa.gov/osw.

Copies of the CFR are generally available for review at libraries or environmental regulatory agencies. For information on purchasing copies, call the Government Printing Office, Customer Service, at (202) 512-1803.

Information on SB 2111, including the complete text of the bill, is also available on the Internet through DTSC s website at http://www.dtsc.ca.gov.

For more information call your local CUPA or the nearest DTSC Regional office.

Where to Contact DTSC

Headquarters Office

Department of Toxic Substances Control 400 P Street P.O. Box 806 Sacramento, CA 95812-0806 (916) 323-6042

NORTHERN CALIFORNIA REGION

Sacramento Office

Department of Toxic Substances Control 10151 Croydon Way, Suite 3 Sacramento, CA 95827 (916) 255-3545

Clovis Office

Department of Toxic Substances Control 1515 Tollhouse Road Clovis, CA 93611 (559) 297-3901

Berkeley Office

Department of Toxic Substances Control 700 Heinz Avenue, Bldg. F, Suite 200 Berkeley, CA 94710 (510) 540-2122

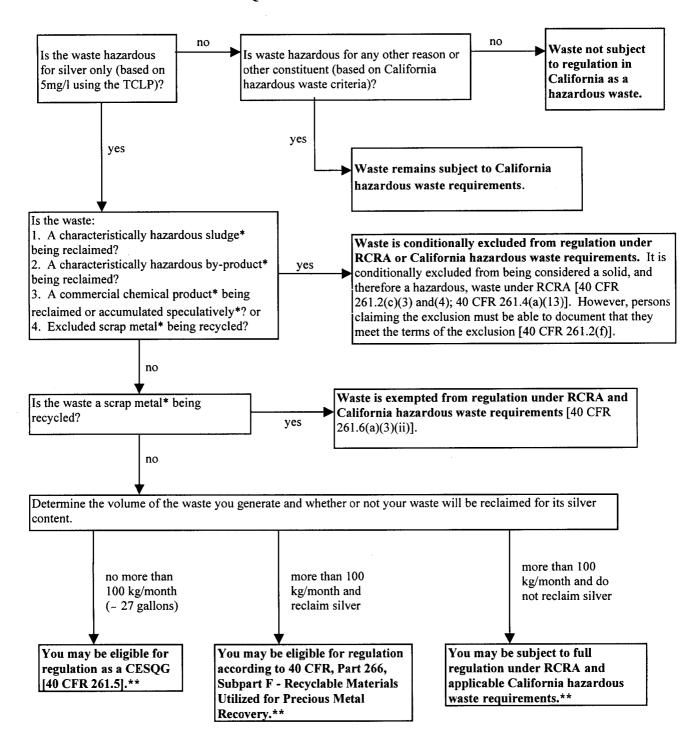
SOUTHERN CALIFORNIA REGION Glendale Office

Department of Toxic Substances Control 1011 N. Grandview Avenue Glendale, CA 91201 (818) 551-2800

Cypress Office

Department of Toxic Substances Control 5796 Corporate Ave Cypress, CA 90630 (714) 484-5300

HOW TO COMPLY WITH REQUIREMENTS EFFECTIVE 1/1/99



^{*} See Selected Definitions on Page 4.

^{* *} See Table 1.

Table 1. RCRA Hazardous Waste Generator Categories and Requirements for "Silver-Only" Hazardous Wastes ¹.

	· · · · · · · · · · · · · · · · · · ·	1	<u> </u>	I
	Conditionally exempt small quantity generator (CESQG) [40 CFR 261.5]	Small quantity generator (SQG) [40 CFR Part 262]	Large quantity generator (LQG) [40 CFR Part 262]	Subpart F Requirements- Recyclable Materials Utilized for Precious Metals Recovery [40 CFR 266.70]
Waste generated per month	No more than 100 kg (~ 27 gallons)	More than 100 but less than 1,000 kg (~27 - 270 gallons)	1,000 kg or more (~270 gallons)	Not applicable
Hazardous Waste Determination	Required [40 CFR 261.5(g)(1)]	Required [40 CFR 262.11]	Required [40 CFR 262.11]	Not applicable
Maximum amount that can be accumulated onsite at any one time	1,000 kg (~270 gallons)	6,000 kg (~ 1,620 gallons)	No limit	No limit
Maximum onsite accumulation time	No limit	180 days (if shipped less than 200 miles) 270 days (if shipped 200 miles or more)	90 days	75% of material accumulated in a calendar year must be recycled.
EPA I.D. number	Not required	Required	Required	Required
Permit or Authorization	Not required	Not required	Not required	Not required
Disposal/Recycling of wastes	Ensure done at authorized facility [40 CFR 261.5(g)(3)]	Designate facility permitted for offsite treatment/storage/disposal [40 CFR 262.20].	Designate facility permitted for offsite treatment/storage/disposal [40 CFR 262.20].	Not applicable
Manifests	Not required	Required	Required	Required
Registered Transporter	Not required	Not required	Not required	Not required
Recordkeeping	Not required	Required	Required	Required (for storage to show that materials not accumulated speculatively.)
Contingency Plans and Training	Not required	Not required [40 CFR 262.34(d)(4)]	Required [40 CFR 262.34(a)(4)]	Not required
Financial Responsibility ²	Not required	Not required	Not required	Not required

¹ "Silver-only" sludges are not subject to these regulations because they are excluded from being considered a solid and a hazardous waste when reclaimed [40 CFR 261.2(c)(3)].

While instruments of financial responsibility are not required, the responsibility remains to clean up any spills or releases, as well as handle and dispose of wastes properly.

HEALTH AND SAFETY CODE SECTION 25143.13 (effective January 1, 1999):

- 25143.13. (a) Notwithstanding any other provision of law, except as provided in subdivision (c), wastes containing silver or silver compounds that are RCRA hazardous wastes solely due to the presence of silver in the waste are subject to regulation under this chapter solely to the extent that these wastes are subject to regulation under the federal act.
- (b) Notwithstanding any other provision of law, wastes containing silver or silver compounds are exempt from regulation under this chapter if the wastes are not subject to regulation under the federal act as RCRA hazardous waste, and the wastes would otherwise be subject to regulation under this chapter solely due to the presence of silver in the waste.
- (c) With respect to treatment of a hazardous waste, subdivision (a) applies only to the removal of silver from photoimaging solutions and photoimaging solution wastewaters. Any other treatment of wastes containing silver or silver compounds that are RCRA hazardous wastes is subject to all of the applicable requirements of this chapter.
- (d) The department shall amend its regulations, as necessary, to conform to this section. Until the department amends these regulations, the applicable regulations adopted by the Environmental Protection Agency pursuant to the federal act pertaining to the regulation of wastes containing silver or silver compounds, which are regulated as RCRA hazardous wastes solely due to the presence of silver in the waste, shall be deemed to be the regulations of the department, except as otherwise provided in subdivision (c).
- (e) This section shall not be construed to limit or abridge the powers or duties granted to any state or local agency pursuant to any law, other than this chapter, to regulate wastes containing silver or silver compounds.

California Environmental Protection Agency Department of Toxic Substances Control P.O. Box 806 Sacramento, CA 95812-0806

RECORDS SEPARATOR PAGE

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Production to

August 26, 2010

I talked with the DTSC Duty Officer, Mary Misemer ((916) 255-3618, mmisemer@dtsc.ca.gov, 8800 Cal Center Drive, Sacramento, CA 95826-3268, (916) 255-3545) about the Henry's Medical X-ray Service case. Because Henry conducts milk runs, picking up silver wastes from different companies all over the Bay Area, he is a transporter, not a generator. Since the waste in question is silver (D011), it is exempt from Title 22, and only the Federal Regs apply. Therefore, the regs concerning conditionally exempt small quantity generators are applicable in this case. Per Mary, if Henry picks up silver waste from a CESQG, no manifest is required, but there should be some kind of shipping record. Henry can take these wastes back to his shop and hold them indefinitely until a second transporter picks them up. Henry has been manifesting these wastes, using his own EPA ID #, but, as long as he's dealing only with CESQGs, this is "over compliance"; a manifest is not required, either when he picks up the silver waste or when the second transporter picks up the waste from Henry's site.

However, if one of Henry's customers is either an SQG or LQG, including other RCRA wastes besides silver, then when Henry picks up their silver waste, a manifest is required, and the originating facility's EPA ID# must be entered on the line requesting generator information. In this type of situation, Henry must comply with the 40 CFR transporter regs, i.e., he cannot store this waste on his site for more than 10 days. If he consolidates this waste with CESQG waste, then all of the waste must comply with the transporters' regs. In this situation, Henry must provide the non-CESQG's manifest to the second transporter, along with the shipping records from all the CESQGs.

Just looking at the DTSC database, it's impossible to tell the names of Henry's customers or their generator status. What I have to do next is send a 3007(a) Request For Information letter to Henry asking for the names and addresses (and, if possible, the EPA ID #s) for all of Henry's customers for the past 3 years. With this information I will try to determine whether or not there were facilities who were SQGs or LQGs. If there were, then these facilities are out of compliance for using Henry's EPA ID# on the manifests rather than their own (and Henry is out of compliance too).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

AUGUST 10, 1995

Mr. Keith H. McCoy CPI Corp. 1706 Washington Avenue St. Louis, MO 63103

Dear Mr. McCoy:

This letter is a follow-up to a recent telephone conversation that you had with Stephen Bergman of my staff regarding several questions you raised in an October 12, 1994 letter concerning silver recovery at photofinishing laboratories. I understand that Stephen faxed you a copy of our August 4, 1995 letter to Kodak on silver recovery and that the letter resolved all of your questions but one.

The remaining issue pertains to the status of spent silver-bearing photo fixer going for reclamation. I understand that you are seeking OSW concurrence that the spent fixer is a characteristic by-product being reclaimed and therefore exempt from the definition of solid waste.

Unfortunately, we are not able to concur. The spent fixer as you described it to Stephen in your conversation meets the 40 CFR §261.1(c) (1) definition of a spent material and therefore, when going for reclamation, is regulated as a solid waste under §261.2(c) (3). However, whether or not the photo lab must comply with any regulations as a hazardous waste generator is dependent upon whether the spent material is accumulated prior to reclamation and whether it is reclaimed on-site.

As long as a lab doesn't accumulate the spent material prior to reclamation, the lab is not subject to any requirements as a hazardous waste generator, including the 40 CFR §§261.5 and 262.34 "counting" requirements used to determine the generator's status based upon the volume of waste generated.

If accumulation does occur prior to reclamation, the lab is required to "count" the volume of waste generated in order to determine its generator status. The regulations that the lab would be required to follow are then dependent upon that status, whether it is a conditionally exempt small quantity generator, a small quantity generator or a large quantity generator. For your information, I have enclosed an EPA handbook on hazardous waste regulations that was developed for small businesses to help them determine whether or not they are hazardous waste generators and, if so, how they are regulated.

In any event, whether or not the spent material is accumulated, the status of the silver recovery unit (as described in the letter to Kodak) remains unchanged. The silver recovery unit is a characteristic sludge being reclaimed and therefore is not a solid waste and therefore not a hazardous waste.

If you require any additional information, please call Stephen Bergman of my staff at (202) 260-5944.

Sincerely,

Michael Petruska, Chief Regulatory Development Branch Nevada through its Department of Environmental Protection. The State of Nevada is authorized to administer and enforce its own RCRA program. This letter will answer in general terms how Federal RCRA regulations apply to the type of operation you describe in your letter.

In order to determine the applicability of RCRA Subtitle C hazardous waste regulations to these activities, it is first necessary to determine if the materials being handled meet the definition of solid waste (and also hazardous waste). There are three secondary materials that require consideration: the spent photographic fixer solution, the precipitated silver sludge and the supernatant liquid resulting from precipitating the sludge. As discussed below, only the spent photographic fixer solution meets the definition of solid waste and is subject to certain Subtitle C regulations.

Regarding the spent photographic fixer solution, RCRA Subtitle C regulation states that materials are solid wastes (that are also hazardous waste) when reclaimed (reclamation is a type of recycling) and when the material being reclaimed most clearly meets the definition of one of four types of materials: spent materials, listed sludges, listed by-products and scrap metal. 40 CFR §261.2(c)(3). Since EPA has previously interpreted spent photographic fixer solution as meeting the definition of spent material (see attached July 16, 1990 letter from Sylvia Lowrance to Ralph Eschborn), it appears that these solutions, assuming they are also hazardous, meet the definition of a solid waste and are subject to certain Subtitle C regulations (specified below).

On the basis of information you have provided in your incoming letter, EPA would consider a silver-bearing sludge precipitated from the spent photographic fixer solution in the manner you describe to be a newly generated sludge exhibiting a characteristic of hazardous waste. Under RCRA Subtitle C regulation, characteristic sludges being reclaimed are not within the definition of solid waste. 40 CFR §261.2(c)(3). Therefore, the silver-bearing sludges would not be subject to Subtitle C regulation. Finally, as mentioned above, you have indicated that the supernatant liquid is nonhazardous and therefore would not be regulated under RCRA Subtitle C.

The remaining issue is what RCRA Subtitle C regulations are

9496.1994(01)

United States Environmental Protection Agency Washington, D.C. 20460 Office of Solid Waste and Emergency Response

February 28, 1994

Mr. Scott Donovan, Chemist Disposal Control Service, Inc. 1200 Marietta Way Sparks, Nevada 89431

Dear Mr. Donovan:

In your letter of November 18, 1993, you requested an interpretation on the applicability of the Resource Conservation and Recovery Act (RCRA) Subtitle C regulations to silver reclamation operations of spent photographic fixer solutions. I apologize for the delay in our response.

In your letter, you state that a company operating in Northern Nevada called Itronics is receiving silver-bearing spent photographic fixer solutions from a variety of generators. You also state that the State of Nevada acknowledges these solutions to be RCRA hazardous waste when silver is present in concentrations of 5 mg/L or greater. Your letter does not indicate whether in fact the solutions Itronics receives are solutions with silver at or above 5 mg/L. Your letter states that Itronics stores the solutions in tanks prior to chemically precipitating silver salts in the form of a sludge which is then thermally refined on-site.

You also indicate that the supernatant liquid resulting from the chemical precipitation is applied to the land as a fertilizer at a turf farm. In your telephone conversation with Paul Borst of the Office of Solid Waste, you indicated that your understanding was that the supernatant liquid was nonhazardous and that sodium thiosulfate in the liquid was the constituent of value in the fertilizer.

Please understand that EPA cannot comment on the regulatory status of the Itronics facility in Northern Nevada. The regulatory status of this facility is properly determined by the State of applicable to the management of the spent fixer solution. Provided that economically significant quantities of silver are reclaimed from the solution, the generation, transport and storage prior to reclamation of the solutions is not subject to the general RCRA Subtitle C requirements for recyclable materials at 40 CFR §261.6, but rather a different set of regulatory requirements specified at 40 CFR Part 266 Subpart F. 40 CFR 261.6(a)(2)(iv). Subpart F requirements apply to persons who generate, transport, or store precious metal-bearing hazardous waste being reclaimed. The requirements specify notification requirements under Section 3010 of RCRA, and manifesting requirements. Subpart F also requires persons who store precious metal-bearing hazardous waste being reclaimed to demonstrate through records that these wastes are not being accumulated speculatively.

With regard to the regulatory status of the recycling process, the general RCRA Subtitle C regulatory requirements for recyclable materials (40 CFR §261.6) and the Subpart F requirements for precious metal-bearing wastes being reclaimed specify regulatory requirements for recycling operations. The general recycling provisions do state that, in general, the recycling process is exempt from regulation. Because recycling operations are generally not regulated, the process of precipitating the sludge from the solution is not presently subject to regulation under RCRA Subtitle.

I hope this letter has answered your questions on the Federal program. If you have any additional questions, please contact Mike Petruska of my staff at (202) 260-8551.

Sincerely yours, Michael Shapiro, Director Office of Solid Waste RCRA/Superfund/OUST Hotline Monthly Report Question

April 1987

3. Multiple Generator Location and Consolidation

A company owns several small factories in different counties. Each factory generates less than 100 kilograms of hazardous waste per month, and is subject to reduced regulation under _261.5. Options for disposal of waste from conditionally exempt generators are provided in _261.5(f)(3). (a) May the conditionally exempt generators transport waste to one of the company's facilities for consolidation and subsequent shipment to a RCRA disposal facility? (b) Does the facility of the generator who is consolidating the waste qualify as a "transfer facility"? (c) Does the generator who consolidates the waste become

- (c) Does the generator who consolidates the waste become a full quantity generator if he ships more than 1000 kg of hazardous waste from his site per month? (or a 100-1000 kg/mo generator if he ships between 100 and 1000 kg of waste per month?)
- (a) Under _261.5(f)(3) in order to remain exempt from certain regulations, a conditionally exempt small quantity generator may ensure delivery of his hazardous waste to a storage, treatment, or disposal facility that is one the following types of facilities:
 - (i.) permitted under Part 270 of 40 CFR; or
 - (ii.) in interim status under Parts 265 and 270 of 40 CFR; or
 - (iii.) authorized to manage hazardous waste by a state with a hazardous waste management program approved under Part 271 of 40 CFR; or
 - (iv.) licensed, registered or permitted by the state to manage municipal or industrial solid waste; or
 - (v.) beneficially uses, reuses or reclaims the waste.

In order for one of the generators to serve as a central collection point for the other generators, he would have to qualify as one of the above mentioned facilities. Realistically, the easiest approach

Transfer Facility

would be for the generator to receive State approval to manage the consolidated waste shipments.

- (b) If the generator does not receive authorization from his State, he may still receive and store the waste for a period of time if he qualifies as a transfer facility. Under _263.12, waste may be stored at a transfer facility for ten days or less without requiring interim status or a permit. The December 31, 1980 Federal Register (45 FR 86966) defines the term transfer facility to refer to transportation terminals (including vehicle parking areas, loading docks and other similar areas), break-bulk facilities or any other facility commonly used by transporters to temporarily hold shipments of hazardous waste during transportation. It is possible that this generator facility may qualify as a transfer facility, as long as the waste is not stored on-site for more than 10 days.
- (c) If the waste is not sent to a facility specified under _261.5(9)(3)(1)-(V), it is no longer conditionally exempt waste, and each generator must comply with applicable regulations. Thus, if the generator cannot receive state approval nor qualify as a transfer facility, he must obtain a permit for storage of hazardous waste.

tot a call from Patrick Ledesma from the San Mateo CUPA ((650) 372-6241, pledesma@co.sanmateo.ca.us regarding the scheduled inspection of Henry's Medical X-ray Services. Patrick and one other inspector would like to accompany me. We arranged to meet at the facility at 8:00 am on August 12. Patrick's CUPA address is 2000 Alameda de las Pulgas, St.e 100, San Mateo, just off Highway 92.

Patrick called back and said that the address given for the facility (501 Lynbrook Dr., Pacifica. CA 94044-1762) is in the middle of a residential neighborhood, and it would seem unlikely that an LQG would have a business in that kind of neighborhood. Base on a google search he did, Patrick found another address for the facility: 480 Collins Ave., Colma, phone number (650) 359-8104. He said his office had information regarding the facility and asked if I wanted to swing by his office first, to look at it. I told him that I'd get back to him later on that.

Jenry Retards

450 Collins Owe

Colora 94014

Colmo Colmo

650-372-6220

August 11, 2010

More info on Henry's Medical X-Ray Services:

The addresses:

- 501 Lynbrook Drive Pacifica, CA 94044
 This is the address used on the manifest
- 338 North Canal St., #2
 South San Francisco, CA 94080
 This is the address that on the manifest is identified as the generator's mailing address
- 480 Collins Ave.

Colma, CA

This is an address that comes up on google

Phone # for Henry: (650) 291-7606

San Mateo CUPA inspectors:

Pacifica: Patrick Ledesma ((650) 372-6241

So. San Francisco: Estuardo Montufar ((650) 372-6240, cell: (650) 766-1583)

Colma: Robert Reed ((650) 372-6220)

Eduardo and Robert will meet me tomorrow, Thursday, at the Starbucks located at 5001 Junipero Serra Blvd at 8:30.

August 5, 2010

Got a call from Patrick Ledesma from the San Mateo CUPA ((650) 372-6241, pledesma@co.sanmateo.ca.us regarding the scheduled inspection of Henry's Medical X-ray Services. Patrick and one other inspector would like to accompany me. We arranged to meet at the facility at 8:00 am on August 12. Patrick's CUPA address is 2000 Alameda de las Pulgas, St.e 100, San Mateo, just off Highway 92.

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Liel of Wastes mention metal in first 3

Falurg

filters - scrawlo Chromium sludy eliminate & facing penalties

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loni Dema. com
hmtr.cherde, dat p. net

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Mr. Blumenfeld,

On Friday, December 10, 2010, my wife and I entered U.S. Appliances on State Street in Hemet, California to conduct some business. They at that time, had a black refrigerator elevated in the back of the store where I was told that they were doing a vacuum check prior to shooting with freon. The employee had just changed the compressor according to the owner, Richard.

I have been studying for an EPA license for freon handling and know the guidelines. The owner of U.S. Appliance does not have proper recovery gear for freon and is in fact releasing it to the atmosphere. The back wall of his store in common with a dojo where children are being exposed to the gas when released.

Thank you for your time, and have a blessed day,

D. L. McDonald, 26060 Girard Street. Hemet, CA. 92544 (951) 826-9256 (951) 826-1304

	Avg. Gals.	_	Avg. Gals.	
Customer	Waste per	Customer	Waste per	
	Month		Month	
Amador PI.	>1.0	Errico	2.3	
Belmont Pet	>1.0	EL-C Vet.	2.4	
Boriskin	>1.0	Mortenson	2.4	
City Img.	>1.0	Schulz	2.4	
Dukes	>1.0	Chiro. Fam.	2.5	
Maddox	>1.0	Med./Marin	2.5	
Parikh	>1.0	Canty	2.6	
UOP	>1.0	Nor Pen Pod	2.6	
Brentwood	1.0	Sutter Pod.	2.6	
Sheldon	1.0	Capuchino	2.8	
Towne Center	1.0	Community	2.8	
Wong, H.	1.0	Coastal Cats	2.9	
Concepcion	1.1	S. F. Dental	2.9	
Kim, J.	1.1	Wolf - G	2.9	
Villasin	1.2	Zarganis	2.9	
Huang	1.3	North State	3.0	
Husby	1.3	Rincon	3.0	
Miision Dist.	1.3	Atlas	3.4	
S. L. Chiro.	1.3	All Animal	3.5	
Tanega	1.3	Tollstrup	3.9	
Colma	1.4	Laurelwood	4.3	
Reimer	1.4	Camino Pet	4.4	
Synapse	1.4	Advanced Spine	4.6	
HealthFit	1.5	Brannan St.	4.7	
Northwood	1.5	Ocean Ave.	4.8	
Redwood Pet	1.5	Masson	5.2	
Reisenauer	1.5	Workman	5.4	
S. L. Chiro.	1.5	49ers *	5.6	
Tang, John	1.5	9 Lives Found	5.8	
Blue Cross	1.6	Nihon Bay	5.9	
Romeo	1.7	Pen. H. S.	6.0	
Westbrook	1.7	HMB Vet.	6.3	
Shaiken	1.8	Wolf - SF	6.4	
Stonestown	1.8	Esp. Cats	7.0	
Passeri	2.0	Home Port.	7.4	
Vale Road	2.0	BA Bird	7.5	
Chau	2.1	Irving Pet	7.7	
Eureka Sq.	2.1	Sequoia	9.9	
Advantage	2.2	Meakim	19.5	
City Hts.	2.2	meanill	10.0	

Henry's Medical X-Ray Services

Amador Pl.			Avg. Gals Waste per Month	
Amador Pi.	>1.0	Errico	2.3	
Belmont Pet	>1.0	EL-C Vet.	2.4	
Boriskin	>1.0	Mortenson	2.4	
City Img.	>1.0	Schulz	2.4	
Dukes	>1.0	Chiro. Fam.	2.5	
Maddox	>1.0	Med./Marin	2.5	
Parikh	>1.0	Canty	2.6	
UOP	>1.0	Nor Pen Pod	2.6	
Brentwood	1.0	Sutter Pod.	2.6	
Sheldon	1.0	Capuchino	2.8	
Towne Center	1.0	Community	2.8	
Wong, H.	1.0	Coastal Cats	2.9	
Concepcion	1.1	S. F. Dental	2.9	
Kim, J.	1.1	Wolf - G	2.9	
Villasin	1.2	Zarganis	2.9	
Huang	1.3	North State	3.0	
Husby	1.3	Rincon	3.0	
Milsion Dist.	1.3	Atlas	3.4	
S. L. Chiro.	1.3	All Animal	3.5	
Tanega	1.3	Tollstrup	3.9	
Colma	1.4	Laurelwood	4.3	
Reimer	1.4	Camino Pet	4.4	
Synapse	1.4	Advanced Spine	4.6	
HealthFit	1.5	Brannan St.	4.7	
Northwood	1.5	Ocean Ave.	4.8	
Redwood Pet	1.5	Masson	5.2	
Reisenauer	1.5	Workman	5.4	
S. L. Chiro.	1.5	49ers *	5.6	
Tang, John	1.5	9 Lives Found	5.8	
Blue Cross	1.6	Nihon Bay	5.9	
Romeo	1.7	Pen. H. S.	6.0	
Westbrook	1.7	HMB Vet.	6.3	
Shaiken	1.8	Wolf - SF	6.4	
Stonestown	1.8	Esp. Cats	7.0	
Passeri	2.0	Home Port.	7.4	
Vale Road	2.0	BA Bird	7.5	
Chau	2.1	Irving Pet	7.7	
Eureka Sq.	2.1	Sequoia	9.9	
Advantage	2.2	Meakim	19.5	
City Hts.	2.2			

Parikh	>1.0
UOP	>1.0
Brentwood	1.0
Sheldon	1.0
Towne Center	1.0
Wong, H.	1.0
Concepcion	1.1
Kim, J.	1.1
Villasin	1.2
Huang	1.3
Husby	1.3
Miision Dist.	1.3
S. L. Chiro.	1.3
Tanega	1.3
Colma	1.4
Reimer	1.4
Synapse	1.4
HealthFit	1.5
Northwood	1.5
Redwood Pet	1.5
Reisenauer	1.5
S. L. Chiro.	1.5
Tang, John	1.5
Blue Cross	1.6
Romeo	1.7
Westbrook	1.7
Shaiken	1.8
Stonestown	1.8
Passeri	2.0
Vale Road	2.0
Chau	2.1
Eureka Sq.	2.1
Advantage	2.2
City Hts.	2.2

Canty	2.6
Nor Pen Pod	2.6
Sutter Pod.	2.6
Capuchino	2.8
Community	2.8
Coastal Cats	2.9
S. F. Dental	2.9
Wolf - G	2.9
Zarganis	2.9
North State	3.0
Rincon	3.0
Atlas	3.4
All Animal	3.5
Tollstrup	3.9
Laurelwood	4.3
Camino Pet	4.4
Advanced Spine	4.6
Brannan St.	4.7
Ocean Ave.	4.8
Masson	5.2
Workman	5.4
49ers *	5.6
9 Lives Found	5.8
Nihon Bay	5.9
Pen. H. S.	6.0
HMB Vet.	6.3
Wolf - SF	6.4
Esp. Cats	7.0
Home Port.	7.4
BA Bird	7.5
Irving Pet	7.7
Sequoia	9.9
Meakim	19.5

Customer	Avg. Gals. Waste per Month	Customer	Avg. Gals. Waste per Month
Amador Pl.	>1.0	Errico	2.3
Belmont Pet	>1.0	EL-C Vet.	2.4
Boriskin	>1.0	Mortenson	2.4
City Img.	>1.0	Schulz	2.4
Dukes	>1.0	Chiro. Fam.	2.5
Maddox	>1.0	Med./Marin	2.5
Parikh	>1.0	Canty	2.6
UOP	>1.0	Nor Pen Pod	2.6
Brentwood	1.0	Sutter Pod.	. 2.6
Sheldon	1.0	Capuchino	2.8
Towne Center	1.0	Community	2.8
Wong, H.	1.0	Coastal Cats	2.9
Concepcion	1.1	S. F. Dental	2.9
Kim, J.	1.1	Wolf - G	2.9
Villasin	1.2	Zarganis	2.9
Huang	1.3	North State	3.0
Husby	1.3	Rincon	3.0
Milsion Dist.	1.3	Atlas	3.4
S. L. Chiro.	1.3	All Animal	3.5
Tanega	1.3	Tollstrup	3.9
Colma	1.4	Laurelwood	4.3
Reimer	1.4	Camino Pet	4.4
Synapse	1.4	Advanced Spine	4.6
HealthFit	1.5	Brannan St.	4.7
Northwood	1.5	Ocean Ave.	4.8
Redwood Pet	1.5	Masson	5.2
Reisenauer	1.5	Workman	5.4
S. L. Chiro.	1.5	49ers *	5.6
Tang, John	1.5	9 Lives Found	5.8
Blue Cross	1.6	Nihon Bay	5.9
Romeo	1.7	Pen. H. S.	6.0
Westbrook	1.7	HMB Vet.	6.3
Shaiken	1.8	Wolf - SF	6.4
Stonestown	1.8	Esp. Cats	7.0
Passeri	2.0	Home Port.	7.4
Vale Road	2.0	BA Bird	7.5
Chau	2.1	Irving Pet	7.7
Eureka Sq.	2.1	Sequoia	9.9
Advantage	2.2	Meakim	19.5
City Hts.	2.2		. 3.0

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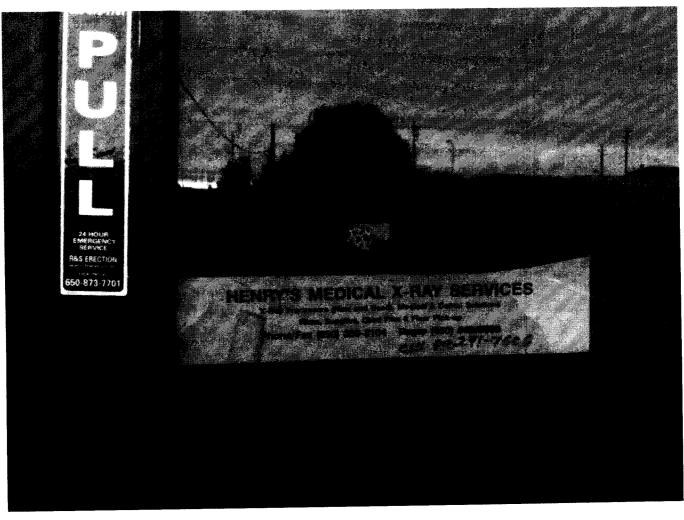
Customer	Avg. Gals.	C4	Avg. Gals.
Customer	Waste per Month	Customer	Waste per Month
Amador PI.	>1.0	Errico	2.3
Belmont Pet	>1.0	EL-C Vet.	2.4
Boriskin	>1.0	Mortenson	2.4
City Img.	>1.0	Schulz	2.4
Dukes	>1.0	Chiro. Fam.	2.5
Maddox	>1.0	Med./Marin	2.5
Parikh	>1.0	Canty	2.6
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Advantage	2.2	Meakim	19.5
City Hts.	2.2		

Kandice Bellamy to: Clint Seiter 08/11/2010 10:06 AM Show Details

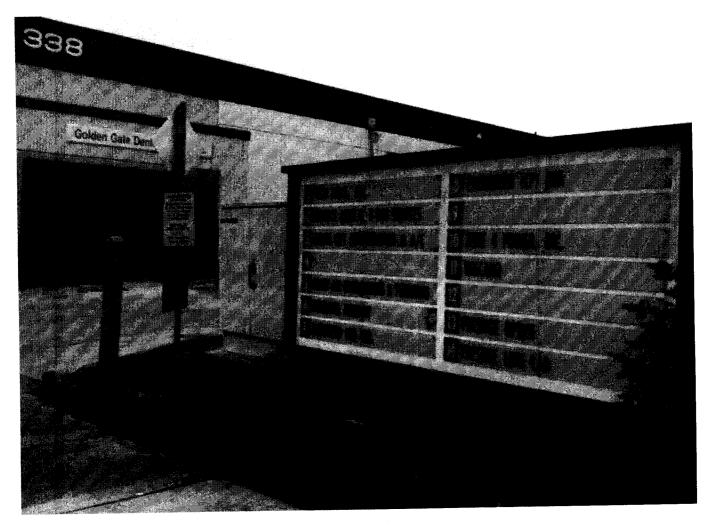
338 North Canal St #2 So Sar Francisco



Sent from my iPhone

650-291-7606

Kandice Bellamy to: Clint Seiter 08/11/2010 10:05 AM Show Details



Sent from my iPhone

Plea	se pri	int or type. (Form desi			ewriter.)							Approved	OMB No.	2050-003
1	W	FORM HAZARDOUS ASTE MANIFEST	CARO	00056	473	2. Page 1 of	(415)	gency Respon 459-8850		4. Manifest	078	235	1 J	JK
	Gener	nerator's Name and Mail HENRYS 338 N. 350TH rator's Phone: Insporter 1 Company Name	SAN FRA	X-RAC ST. F NCISCO (650) 3	= 2. CA, 940 598104	80	5	r's Site Addres SNRY S OI MA PAOFI	HELL	nan mailing addre	LYX	1 B P O	ok.	PR
Н		insponer i Company wai tell Environmental		_						CAD962				
		nsporter 2 Company Na								U.S. EPA ID	Number			
		to Weste Recyclin								CAD981 U.S. EPAID				
	Ph/ 29	oto Waste Recycle 80 Kerner Blvd.	ng	·							1429673		· .	u et
	Facilit	n Rafael, CA 9401 tys Phone: (455) 4	50-38=7				т					·		
	9a. HM	9b. U.S. DOT Descrip and Packing Group (if		Shipping Name, H	lazard Class, ID Number,			10. Cont No.	ainers Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	s
GENERATOR -		1. Hazardous Wast	e, Liquid, n.o.s.	(silver), 9, l	NA 3082, PGIII			10	DF	550	G	D011	541	
- GENEI		2.												
		3.												
		<u> </u>							<u> </u>					
		4.			•									
	14 6	pecial Handling Instruction	ne and Additional Info	nmation						<u> </u>	.			
		ear Protective Clot	<u>-</u>		re that the contents of this		om fulls as	ad annumber		hu tha anna ah	loolog game		nifed and	
		marked and labeled/place Exporter, I certify that the Acertify that the waste m	arded, and are in all n contents of this cons inimization statement	espects in proper of ignment conform t	condition for transport according to the terms of the attached R 262.27(a) (if I am a larger	cording to appli ad EPA Acknow	icable inten viedgment (national and na of Consent.	itional governm	ental regulations.	if export sh	pment and I	am the Prima	ary
	X	rator a Offeror's Printed The North American Shipments	9 KIC	349	RDS	, A				rel		Ø	th Day 1/3	Vear 109
ENI		sporter signature (for exp			L	_ Export from			intry/exit: ving U.S.:					
		ransporter Acknowledgmosporter 1 Printed/Typed N		NZIS		Sig	nature		M			Mon	th Day	Year
RANSPORTER	Trans	sporter 2 Printed/Typed N		·Ve	EARLOE	Sig	nature	NYOU	10 H	TARDO	- 	Mor	/ / <u>/ 3</u>	09 Year
F	£	Pw. n	ESC	254	R				u <i>lte</i>	(D)		ط_	<u> </u>	109
	-	Discrepancy Indication S	pace Quar	ntity	Туре	,	Ē	Residue		Partial Rej	ection		Full Reje	ction
	16. /	Alternate Facility (or Gen	erator)				Ma	nifest Reference	ce Number:	U.S. EPA ID N	lumber			
		ity's Phone:					···-		<u></u>	<u> </u>	,			
	,	Signature of Alternate Fa	clify (or Generator)									Mod	nth Day	Year
		ardous Waste Report	Management Method	Codes (i.e., codes	for hazardous waste trea	itment, disposa	al, and recy	cling systems)		[4.				
		<u> 41010</u>								1	<u>} </u>			
		ted Facility Owner t Name	Operator: Certifica	tion of receipt of h	azardous materials cover		ifest except inature	t as noted in Ite	m 18a		/	Mor	ith Day	Year
		7 (Day 3 05)	Previous editions	+ lokou	<u>) </u>)ESIGI	NATER -		MESTIN	O	10	1116	<u>p</u> 4

Ple	ase p	rint or type. (Form desig		lite (12-pitch) typewriter.)						Form	n Approved	I. OMB No.	. 2050-003
1		FORM HAZARDOUS	1. Generator ID N	umber		2. Page 1 of	Emergency Response	onse Phone	4. Manifest	Tracking N	umber		
П	L	ASTE MANIFEST	CAR000056	473		1	(650) 291-7608	5	1 00	078	288	34 J	JK
		enerator's Name and Mailin					Generator's Site Addr	ress (if different	than mailing addre	ss)			
П		rry's Medical Xray 5 8 North Canal Street					Henry's Medica	al Xray Serv	ice				
П		uth Sen Francisco, C					501 Lymbrook (
Ш	Gene	erator's Phone: (ムラウ) フロー	1-7606			1	Pacifica, CA 94	1044					
П	6. Tr	ansporter 1 Company Name	е						U.S. EPA ID	Number			
П	Bri	ttell Environmental C	Corporation	•					CAD 98	2434037			
П	7. Ta	ansporter 2 Company Name	8		······································				U.S. EPA ID I				
П	Phy	oto Waste Recycling	Co., Inc.						CAD OR	1420672			
Ш	8. De	signated Facility Name and	Site Address						U.S. EPA ID				
П		ioto Waste Recycling	g Co.,Inc.						CAD 98	1429673			
П		80 Kerner Blvd											
П	Facil	in Rafael CA 94901 itys Phone: <u>(415) 450</u>	2.8857						1				
П	9a.	1 ,		r Shipping Name, Hazard Clas	ss, ID Number,		10. Co	ntainers	11. Total	12. Unit			
П	НМ	and Packing Group (If at	ny))				No.	Туре	Quantity	Wt.Vol.	13.	Waste Code	es
1	П	1.											T
Į₽		Hazardous Waste	Liquid, N.O.S	.,9,NA 3082, PG III (S	ālver)		11	DF	1605	G	541	0011	
≨							''	İ	1000				
GENERATOR		2.							1				<u> </u>
ত	1		•									<u> </u>	ļ
Ш							ŀ	ł					l
П		3.											İ
П		İ					1		ł				ļ
П	1							1					-
П		4.							1				1
П								•					ļ
П	ĺ	l'			•		ļ		1				
Ш	14. S	pecial Handling Instructions	and Additional Inf	ormation									
П	Sp	ent Photographic Wa	este Containin	g Silver. Wear appro	opriate prted	tive equip	ment.						
П	1			,	• •	• •							
П		· ·											
П	15.	GENERATOR'S/OFFEROR	S'S CERTIFICATIO	N: I hereby declare that the	contents of this o	consignment a	re fully and accurately	described above	e by the proper sh	ipping name	, and are cla	ssified, pack	aged,
П		marked and labeled/placard Exporter. I certify that the co	ied, and are in all r outents of this cons	espects in proper condition fo signment conform to the terms	r transport accor	ding to applica FPA Acknowle	ible international and i	national govern	mental regulations.	If export shi	pment and I	am the Prim	nary
Ш	ا ا	certify that the waste minin	nization statement	identified in 40 CFR 262.27(a) (if I am a large	quantity gene	rator) or (b) (if i am a s	small quantity g	enerator) is true.				
П	Gerre	rator's/Offeror's Printed/Type	ed Name			Sigp	att at	/ /		-//	Mo	nth Day	Year
1	$I \triangle$	HENIZ	4 20	CHAPDS	5	1				1	D'	7 1 <i>14</i>	109
귿	/16. Inf	ternational Shipments	Import to	U.S.		Export from U.	Port of	entry/exit:		-			
Z	Trans	porter signature (for export		. 4.5.				aving U.S.:					
吊	17. To	ansporter Acknowledgment	of Receipt of Mater	ials \				1				_	
TRANSPORTER	Transi	porter 1 Printed/Typed Nam	S	14=-00=		Signa		1)		Mor	nth Day	Year
<u>8</u>	L	<u> </u>		. VECARD		1	MIROLI		EARDE		lo	71/4	p9
Ž	Trans	porter 2 Printed/Typed Nam		^		Signa					Mor	Bay	Year
E	L_		Atil	TRO				11			L	146	08
1	18. Di	screpancy					10				- (
П	18a. C	Discrepancy Indication Space	e Quan	tity	Туре		Residue		Partial Reje	ection		Full Reje	action
Ш				,	,,,,,,						•		
ı							Manifest Referen	nce Number:					
Ł	18b. A	Itemate Facility (or General	tor)						U.S. EPA ID N	umber			
l)			•										
¥	Facility	y's Phone:											
	18c. S	ignature of Alternate Facility	y (or Generator)								Mo	nth Day	Ye
₹		•		•								1	1
DESIGNATED FACILITY	19. Ha	zardous Waste Report Man	nagement Method	Codes (i.e., codes for hazardo	ous waste treatm	ent, disposal,	and recycling systems	3)					
ä	1.			2.		3.			4.				
<u> </u>		HOI	0							$\overline{}$	1		
Ш	20. De	signated Facility Owner or	Operator: Cartilica	tion of receipt of hazardous m	aterials covered	by the manife	st except as noted in I	tem 18a	24		 	······································	
$\ \ $		/Typed Name	1.	1		Signa			11/	\ \	Mo	nth Day	
			Asi.	<i></i> .	`	-		~	. NII Vii		Ti i	7 . 1	
		~	~ W.I	TIDADA)	l			マイスス ス しい	/ \	W	1 114	-1
↓ EPA	Form	8700-22 (Rev. 3-05) Pr	evious editions	TOREL are obsolete.)		SIGNATED F	ACULT	aug w		STATE	111	

Jea	ise prir	nt or type. (Form desig	ned for use on elite	(12-pitch) typewrite	er.)								OMB No. 20	100-0039
1		ORM HAZARDOUS ASTE MANIFEST	1. Generator ID Num CARODO5647			2. Page 1 of 1	(650) 2	ncy Response 91-7606		4. Manifest 1	078	27 <u>5</u>	7 JJ	K
	5, Ger	nerator's Name and Mailin	g Address				Generator's	Site Address (Medical X	(if different the	an mailing addres	s)			.
		North Canal Street		•			•	abrook Driv	•	~				. 1
	Sou	ith San Francisco, C	A 94080					, CA 9404						1
ı	Gener	rator's Phone: (650) 29	1-7606							U.S. EPA ID N	lumbar			
		nsporter 1 Company Nam tell Environmental (•		CAD 982				
		nsporter 2 Company Nam				•				U.S. EPAID N				
۱		signated Facility Name an								U.S. EPA IDA	1429673			
١		om waste kecyciii. 80 Kerner Blvd	g co.,n.e.		·			*						1
1	Se	n Rafael CA 94901										-		
١	Facilit	ty's Phone: (415) 45	9-8852								1 1			
	9a. HM	9b. U.S. DOT Descripti and Packing Group (if	ion (including Proper S	Shipping Name, Hazan	d Class, ID Number	,	-	10. Contain	ners Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Codes	
1	<u> </u>	1		0 444 2002 PC 1	II. (CT)				DF		G	541	D011	
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П	14. 8	Special Handling Instruction	ns and Additional info	rmation	appropriate pr									
		GENERATOR'S/OFFERI marked and labeled/place Exporter, I certify that the Joertify that the waste mi frator's/Offeror's Printed/T	arded, and are in all re contents of this consi inimization statement	espects in proper condi- ignment conform to the	ition for transport a terms of the attacl	ccording to app hed EPA Acknor	wiedament o	iauonai anu na If Consent.	uutai guveiis	Heriter reference in	hipp ing nam s. If export sh		ssified, packa am the Prima	iged, iry Year
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į	19.1	Hazardous Waste Report	Management Method	Codes (i.e., codes for	HIGEGIADAS MASIG D	aument, dispo		enis atamina)		4.				
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		Designated Facility Owner ted/Typed Name	r or Operator: Certifica	or receipt of naza	TUOUS TRAISTRAIS CON	S S S S S S S S S S S S S S S S S S S	signature	COLUMN III		-1/.	. 1/	N	onth Day	
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Enforcement & Compliance History Online (ECHO)

You are here: EPA Home Compliance and Enforcement ECHO Search Data Search Results

Detailed Facility Report



Report Error



For Public Release - Unrestricted Dissemination Report Generated on 08/25/2010 US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110002929840	HENRYS MEDICAL XRAY SERVICES	501 LYNBROOK DR	PACIFICA	CA	94044
RCRA	RCR	CAR000056473	HENRYS MEDICAL XRAY SERVICES	338 N CANAL ST	SOUTH SAN FRANCISC	CA	94080

Facility Characteristics

Data Dictionary

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
2	110002929840					LRT: 37.654938 , -122.475517	No		
RCRA	CAR000056473	Transporter	Active (H)				No		562111 562112

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
RCRA	CAR000056473	0	Never	0	\$00

Compliance Monitoring History (05 years)

Data Dictionary

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
- No data reco	rds returned.					

Entries in italics are not considered inspections in official counts.

Compliance Summary Data

Data Dictionary

Information on the nature of alleged violations is available on the FAQ page.

Statute	Source ID	Current SNC/HPV?	Description	Current As Of	Qtrs in NC (of 12)
RCRA	CAR000056473	No		08/09/2010	0

Three Year Compliance Status by Quarter

Data Dictionary

Violations shown in a given quarter do not necessarily span the entire 3 months. Information on the nature of alleged violations is available

on the FAQ page, and information on the duration of non-compliance is available at the end of this report.

					RCRA	Compliar	nce Statu	IS					
Statute:Source ID RCRA: CAR000056473		QTR1 Oct- Dec07	QTR2 Jan- Mar08	QTR3 Apr- Jun08	QTR4 Jul- Sep08	QTR5 Oct- Dec08	QTR6 Jan- Mar09	QTR7 Apr- Jun09	QTR8 Jul- Sep09	QTR9 Oct- Dec09	QTR10 Jan- Mar10	QTR11 Apr- Jun10	QTR12 Jul- Sep10
Facility Level Status		Compl	Compl	Compl									
Type of Violation	Agency												

The first date displayed for a RCRA Violation corresponds to the violation determination date, and the next to the resolution date (if the violation has been resolved).

Notices of Violation or Informal Enforcement - AFS, PCS, ICIS-NPDES, RCRAInfo (05 year history)

Statute	Source ID	Type of Action	Lead Agency	Date	
		- No data records returned.			

Formal Enforcement Actions - (05 year history)

AFS, PCS, RCRAInfo, NCDB

Data Dictionary

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data	records returned.					

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

ICIS

Data Dictionary

Primary Law/Section	Case Number	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost	
- No data reco	rds returned	1 .									

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS-FE&C). These actions may duplicate records in the Formal Enforcement Actions section.

TRI History of Reported Chemicals Released in Pounds per Year at Site:

Data Dictionary

Year	Total Air	Surface Water	Underground	Releases to	Total On-site	Total Off-site	Total Releases and
	Emissions	Discharges	Injections	Land	Releases	Transfers	Transfers
- No	data records retu	rned.					

TRI Total Releases and Transfers by Chemical and Year

Chemical Name	1997	1998	1999	2000	2001	2002	2003	2004	2005	
- No data records returned.										

Demographic Profile of Surrounding Area (3 Miles)

Data Dictionary

Open more detailed information in a new window (links leave ECHO): 1 Mi 3 Mi or 5 Mi.

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available.

Radius of Area:	3 Miles	Land Area:	65.19%	Households in area:	44,365
Center Latitude:	37.654187	Water Area:	34.81%	Housing units in area:	45,041
)					

Center Longitude:	-122.475578	Population Density:	7477.16/sq. mi.	Households On Public Assistance:	906
Total Persons:	137,804	Percent Minority:	70.06%	Persons Below Poverty Level:	6,661

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	53,085 (38.52%)	Child 5 years and less:	9,871 (7.16%)
African-american:	4,843 (3.51%)	Minors 17 years and younger:	31,122 (22.58%)
Hispanic-Origin:	27,679 (20.09%)	Adults 18 years and older:	106,679 (77.41%)
Asian/Pacific Islander:	57,703 (41.87%)	Seniors 65 years and older:	17,050 (12.37%)
American Indian:	652 (0.47%)		
Other/Multiracial:	11,768 (8.54%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	5,623 (6.66%)	Less than \$15,000:	3,240 (7.30%)
9th-12th grades:	7,670 (9.08%)	\$15,000-\$25,000:	3,040 (6.85%)
High School Diploma:	19,889 (23.55%)	\$25,000-\$50,000:	9,593 (21.62%)
Some College/2-yr:	23,083 (27.33%)	\$50,000-\$75,000:	10,150 (22.88%)
B.S./B.A. or more:	28,191 (33.38%)	Greater than \$75,000:	18,351 (41.36%)

Please note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

Notice About Duration of Violations -- The duration of violations shown on this report is an estimate of the actual duration of the violations that might be alleged or later determined in a legal proceeding. For example, the start date of the violation as shown in the ECHO database is normally when the government first became aware of the violation, not the first date that the violation occurred, and the facility may have corrected the violation before the end date shown. In some situations, violations may have been corrected by the facility, but EPA or the State has not verified the correction of these violations. In other situations, EPA does not remove the violation flag until an enforcement action has been resolved.



This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: RCRAInfo: 08/09/2010. FRS: 08/12/2010.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

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	33	awy's Medical Way (8 North Canal Street eth San Francisco, (t #2	*		SO	Acifi	CA	an mailing addres	948	544		
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I	20	oto Weste Recycling	Co., inc.						U.S. EPA ID I				
		lesignated Facility Name at troto Weste Recyclin							CAD 98	1429673			
П	3	980 Kerner Blvd		4.4					t				
	Fac	em Refaci CA 94901 ility's Phone: <u>//// ex sa</u>	(C_2997)							10.11-1			
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	HN	and Packing Group (if	any))				110.				E41	2011	
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		certify that the waste n	ninimization statement identified in 40) CFR 262.27(a) (if I am a l	arge quantity g	enerator) or	(b) (if I am a sm	all quantity	generator) is true.		M	onth Da	/ Year
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Z	- 1	8b. Alternate Facility (or Ge	nerator)						U.S. EPA N	O Number			
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200	F	acility's Phone: 8c. Signature of Alternate F	ertity (or Generator)						<u> </u>			Month D	ay Year
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DECIDINATED CACILITY		9. Hazardous Waste Repor	t Management Method Codes (i.e., o	codes for hazardous waste	treatment, disp	osal, and re	cycling systems	:)	4.				
Ž			2.			3.			*				
	-	170	er or Operajor: Certification of receipt	nt of hazardous materials or	overed by the m	nanifest exc	ept as noted in I	tem 18a		11			
		 Designated Facility Own Printed/Typed Name 	er or Operator. Certification Coreces	TO THE OWNER OF THE OWNER OWNE		Signature	. =		Kiiik	1/11		0412	ay Year 2409
			Tuy to	nes)				/	1 14				
Ē	PAF	orm 8700-22 (Rev. 3-0)	Previous editions are obsolet	e.		DESIG	GNATED	FACILIT	VIO DES	INATIO	N SIAI	c (ir Kt	עטוחבו

August 11, 2010

More info on Henry's Medical X-Ray Services:

The addresses:

- 501 Lynbrook Drive
 Pacifica, CA 94044
 This is the address used on the manifest
- 338 North Canal St., #2
 South San Francisco, CA 94080
 This is the address that on the manifest is identified as the generator's mailing address
- 480 Collins Ave.

Colma, CA

This is an address that comes up on google

Phone # for Henry: (650) 291-7606

San Mateo CUPA inspectors:

Pacifica: Patrick Ledesma ((650) 372-6241

So. San Francisco: Estuardo Montufar ((650) 372-6240, cell: (650) 766-1583)

Colma: Robert Reed ((650) 372-6220)

Eduardo and Robert will meet me tomorrow, Thursday, at the Starbucks located at 5001 Junipero Serra Blvd at 8:30.

291000

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Thursday, Argust 5, 2010

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DTSC: HWTS Reports

HWTS - RCRA Waste Code By Year Matrix

EPA ID: CAR000056473 Name: HENRYS MEDICAL

XRAY SERVICES

Entity:	Generator											
RCRA			Weight (in Tons)									
RCRA Code	Description	1999	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Blank/Unknown						1.14675					
D011	Silver	5.56690	8.98540	25.34104	22.68897	25.68720	14.65755	24.33195	15.59580	10.21650	16,05450	2 .29350
	TOTALS	5.56690	8.98540	25.34104	22.68897	25.68720	15.80430	24,33195	15.59580	10.21650	16.05450	2.29350

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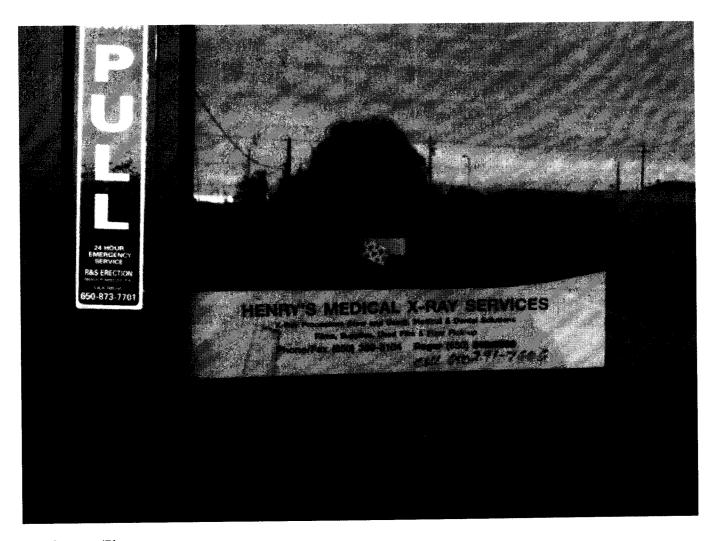


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HWTS - RCRA Waste Code By Year Matrix

EPA ID: car000056473 Name: HENRYS MEDICAL XRAY

RCRA		· ·	Weight (in Tons)									
Code	Description	1999	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
	Blank/Unknown						1,14675					
D011	Silver	5,56690	8.98540	25.34104	22,68897	25.68720	14.65755	24.33195	15,59580	10.21650	16.05450	2,29350
	TOTALS	5.56690	8.98540	25.34104	22.68897	25.68720	15.80430	24.33195	15.59580	10.21650	16.05450	2,29350

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Newst Starboack. 191 Hickory Blod, Paufria 94044



MAPQUEST.

Trip to 501 Lynbrook Dr

Pacifica, CA 94044-1762 0.62 miles - about 2 minutes







791 Hickey Blvd, Pacifica, CA 94044-1214

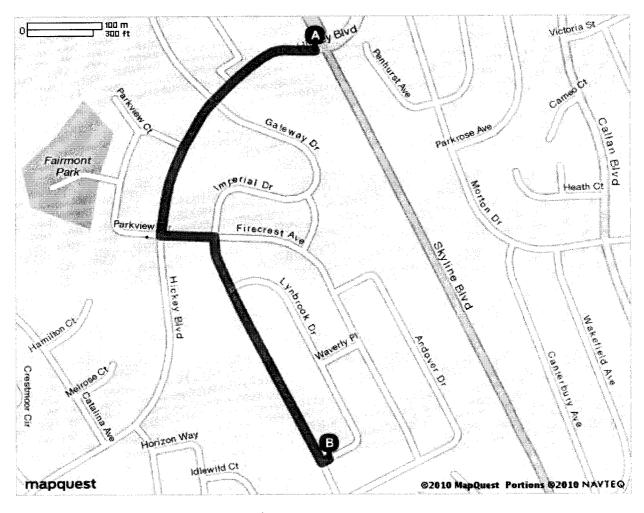
ЗТАНТ	Start out going WEST on HICKEY BLVD toward FAIRMONT SHOPPING CTR.	go 0.3 mi
•	2. Turn LEFT onto FIRECREST AVE.	go 0.0 mi
	3. Turn RIGHT onto IMPERIAL DR.	go 0.3 mi
	4. Turn LEFT onto LYNBROOK DR.	go 0.0 mi
END	5. 501 LYNBROOK DR is on the RIGHT.	go 0.0 mi



501 Lynbrook Dr, Pacifica, CA 94044-1762

Total Travel Estimate: 0.62 miles - about 2 minutes

Route Map Hide



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Heip

EPA ID: CAR000056473	Name: HENRYS MEDICAL
XRAY SERVICES	
Status: INACTIVE Inac	ctive Date: 2000-06-30 Contact:
HENRY RICHARDS	
County: SAN MATEO	SIC: Record Entered: 2000-04-
27 Last updated: 2010-07	-06

	Name	Address	City	State	ZIP	Phone
Location	SERVICES	501 LYNBROOK DR		1	940440000	
Mailing		501 LYNBROOK DR	PACIFICA	CA	940440000	
Owner	HENRY RICHARDS			99		0000000000
Oper/Contact	HENRY RICHARDS	INACT 00VQ FINAL NOTICE - BATCH	PACIFICA	99	940440000	6503598104

Based ONLY upon EPA ID: CAR000056473:

Calif. Manifests?		Transporter Registration?		Calsites Data?
YES	NO	NO	NO	NO

Calif. Manifest Counts and Total Tonnage							
			m = Ma	nifest Count t	Total Tonnage		
Ship Year	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF		
1999	2 (m) 5.56690 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00 <u>000</u> (t)			
2001	39 (m) 8,98540 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)		
2002	58 (m) 25.34104 (t)	0 (m) 0.00000 (t)	0 (m) 0,00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)		
2003	17 (m) 22.68897 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	<u>0</u> (m) 0.00000 (t)		
2004	13 (m) 25.68720 (t)	B	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)		
2005	8 (m) 15.80430 (t)		0.00000	0 (m) 0.00000 (t)			
2006	11 (m) 24.33195 (t)	0.00000		0 (m) 0.00000 (t)	9 (m) 0.00000 (t)		
2007	5 (m) 15.59580 (t)	0 (m) 0.00000 (t)		0 (m) 0.00000 (t)	0 (m) 0.00000 (t)		

2008	4 (m) 10.21650 (t)	l (m) 3.10665 (t)			
2009	6 (m) 16.05450 (t)	0 (m) 0.00000 (t)			0 (m) 0.00000 (t)
2010	l (m) 2.29350 (t)		0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)

Waste Code By Year Matrix Report								
Calif.	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF			
RCRA	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF			

End of Report



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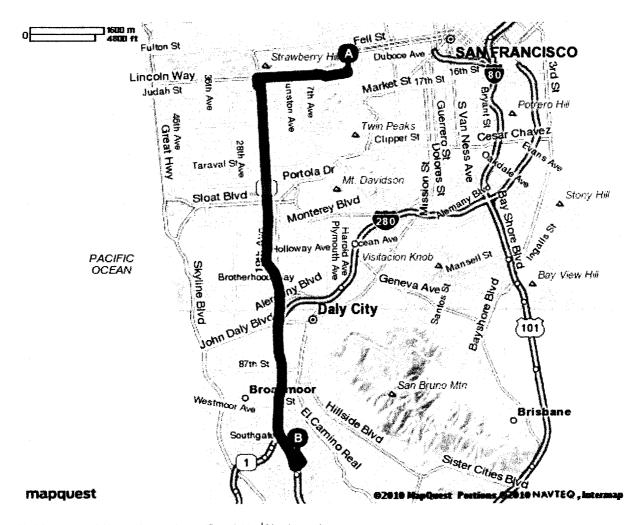
47A Exit	10. Take the SERRAMONTE BOULEVARD exit, EXIT 47A.	go 0.2 mi
(SAMP)	11. Turn SLIGHT LEFT to take the ramp toward COLMA.	go 0.0 mi
	12. Turn LEFT onto SERRAMONTE BLVD.	go 0.1 mi
	13. Turn LEFT onto JUNIPERO SERRA BLVD.	go 0.2 mi
ENO	14. 5001 JUNIPERO SERRA BLVD is on the RIGHT.	go 0.0 mi



5001 Junipero Serra Blvd, Colma, CA 94014-3217

Total Travel Estimate: 8.75 miles - about 17 minutes

Route Map Hide



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http://www.mapquest.com/print

Directions and maps are informational only. We make no warranties on the accuracy of their content, road conditions or route usability or expeditiousness. You assume all risk of use. MapQuest and its suppliers shall not be liable to you for any loss or delay resulting from your use of MapQuest. Your use of MapQuest means you agree to our Terms of Use

Kandice Bellamy to: Clint Seiter 08/06/2010 09:42 AM Show Details

480 Collins Ave Colma

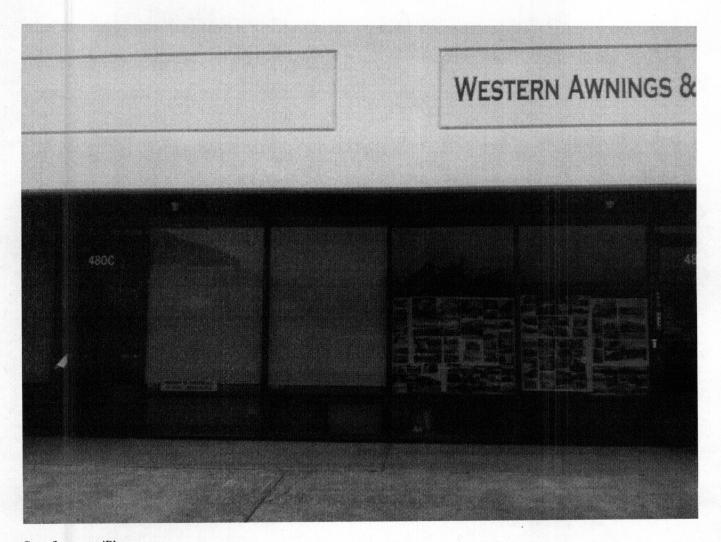
History: This message has been forwarded.



Sent from my iPhone

Kandice Bellamy to: Clint Seiter 08/06/2010 09:45 AM Show Details

History: This message has been forwarded.



Sent from my iPhone

Kandice Bellamy to: Clint Seiter 08/06/2010 09:44 AM Show Details

History: This message has been forwarded.



Sent from my iPhone



MAPQUEST.

Trip to 5001 Junipero Serra Blvd Colma, CA 94014-3217 8.75 miles - about 17 minutes

Notes



Ready to Rebuild Your Retirement?

If you have a \$500,000 portfolio, download the guide by Forbes columnist and money manager Ken Fisher. It's called "The 15-Minute Retirement Plan." Even if you have something else in place right now, it still makes sense to request your guide!

I► Click here to download

FISHER INVESTMENTS"



769 Cole St, San Francisco, CA 94117-3903

START	Start out going SOUTH on COLE ST toward FREDERICK ST.	go 0.0 mi
(r)	2. Turn RIGHT onto FREDERICK ST.	go 0.4 mi
•	3. Turn SLIGHT RIGHT onto LINCOLN WAY.	go 0.2 mi
•	4. Turn LEFT onto KEZAR DR.	go 0.0 mi
•	5. KEZAR DR becomes LINCOLN WAY.	go 1.0 mi
•	6. Turn LEFT onto 20TH AVE.	go 0.1 mi
•	7. Turn LEFT onto IRVING ST.	go 0.0 mi
P SOUTH	8. Turn RIGHT onto 19TH AVE / CA-1 S. Continue to follow CA-1 S.	go 5.8 mi
1 985	9. Stay STRAIGHT to go onto I-280 S.	go 0.6 mi

4	-	int or type. (Form designed for use on elite (12-pitch) typewriter.)					Form	n Approved.	OMB No.	2050-0039
	. W	ASTE MANIFEST CAROCOD 5 6473	- 1.	. Emergency Respon (415) 459-8850		4. Manifest	078	2234	9 J	JK
	5. Ge	nerator's Name and Mailing Address	G	enerator's Site Addres	ss (if different to	nan mailing addres	is)			
Ш	5. Generator's Name and Mailing Address @# HENDYS MEDICAL X-RAY SERVICES 338 NORTH CANAL ST # 2 Generator's Phone: Generator's Phone: Generator's Phone: Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) SOI LYN BROOK DE PAUFICA CA. 94044									
Ш	Gener	rators Phone: SOUTH SAN TRANCISCO 144	1	PAUPIC	м С	<i>7</i> 1 (
		nsporter 1 Company Name				U.S. EPA ID N				
1	CANAL CONTRACTOR	tell Environmental Corporation nsporter 2 Company Name				U.S. EPA ID N				
		Weste Recycling			0	CADSSI	420623			
Ш		signated Facility Name and Site Address			•	U.S. EPAID N	lumber : L429673			
Ш	29	oto Waste Recycling 80 Kerner Blvd.				CAL) 50.	1425075			
Ш	Ses Facilit	n Rafael, CA 94010 ly's Phone: 74151 450,8352			1					
$\ $	9a.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Cont		11. Total	12. Unit Wt./Vol.	13.	Waste Code	s
1	НМ	1.		No.	Туре	Quantity	VVL/VOI.			
GENERATOR		Hazardous Waste, Liquid, n.o.s. (silver), 9, NA 3082, PGIII		16	DF	880	G	D011	541	
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	We	ear Protective Clothing, ERG 171 GENERATOR'S INSEEDOR'S CERTIFICATION: Thereby declare that the contents of this of	consignment are	fully and accurately	described abov	e by the proper sh	ipping name	e, and are cla	ssified, pack	aged,
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August 11, 2010

More info on Henry's Medical X-Ray Services:

The addresses:

- 501 Lynbrook Drive
 Pacifica, CA 94044
 This is the address used on the manifest
- 338 North Canal St., #2
 South San Francisco, CA 94080
 This is the address that on the manifest is identified as the generator's mailing address
- 480 Collins Ave.

Colma, CA

This is an address that comes up on google

Phone # for Henry: (650) 291-7606

San Mateo CUPA inspectors:

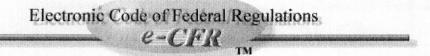
Pacifica: Patrick Ledesma ((650) 372-6241

So. San Francisco: Estuardo Montufar ((650) 372-6240, cell: (650) 766-1583)

Colma: Robert Reed ((650) 372-6220)

Eduardo and Robert will meet me tomorrow, Thursday, at the Starbucks located at 5001 Junipero Serra Blvd at 8:30.

Home Page > Executive Branch > Code of Federal Regulations > Electronic Code of Federal Regulations



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Title 40: Protection of Environment

PART 262—STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE Subpart B—The Manifest

Browse Next

§ 262.20 General requirements.

- (a)(1) A generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, and disposal facility who offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050–0039) on EPA Form 8700–22, and, if necessary, EPA Form 8700–22A, according to the instructions included in the appendix to this part.
- (2) The revised manifest form and procedures in 40 CFR 260.10, 261.7, 262.20, 262.21, 262.27, 262.32, 262.34, 262.54, 262.60, and the appendix to part 262, shall not apply until September 5, 2006. The manifest form and procedures in 40 CFR 260.10, 261.7, 262.20, 262.21, 262.32, 262.34, 262.54, 262.60, and the Appendix to part 262, contained in the 40 CFR, parts 260 to 265, edition revised as of July 1, 2004, shall be applicable until September 5, 2006.
- (b) A generator must designate on the manifest one facility which is permitted to handle the waste described on the manifest.
- (c) A generator may also designate on the manifest one alternate facility which is permitted to handle his waste in the event an emergency prevents delivery of the waste to the primary designated facility.
- (d) If the transporter is unable to deliver the hazardous waste to the designated facility or the alternate facility, the generator must either designate another facility or instruct the transporter to return the waste.
- (e) The requirements of this subpart do not apply to hazardous waste produced by generators of greater than 100 kg but less than 1000 kg in a calendar month where:
- (1) The waste is reclaimed under a contractual agreement pursuant to which:
- (i) The type of waste and frequency of shipments are specified in the agreement;
- (ii) The vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste; and
- (2) The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement.
- (f) The requirements of this subpart and §262.32(b) do not apply to the transport of hazardous wastes on a public or private right-of-way within or along the border of contiguous property under the control of the same person, even if such contiguous property is divided by a public or private right-of-way. Notwithstanding 40 CFR 263.10(a), the generator or transporter must comply with the requirements for transporters set forth in 40 CFR 263.30 and 263.31 in the event of a discharge of hazardous waste on a public or private right-of-way.

[45 FR 33142, May 19, 1980, as amended at 49 FR 10500, Mar. 20, 1984; 51 FR 10175, Mar. 24, 1986; 53 FR 45090, Nov. 8, 1988; 62 FR 6651, Feb. 12, 1997; 70 FR 10815, Mar. 4, 2005; 70 FR 35037, June 16, 2005]

Browse Next

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Section 508 / Accessibility

40 CFR 263.20(h)

- (h) A transporter transporting hazardous waste from a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month need not comply with the requirements of this section or those of §263.22 provided that:
- (1) The waste is being transported pursuant to a reclamation agreement as provided for in §262.20(e);
- (2) The transporter records, on a log or shipping paper, the following information for each shipment:
- (i) The name, address, and U.S. EPA Identification Number of the generator of the waste;
- (ii) The quantity of waste accepted;
- (iii) All DOT-required shipping information;
- (iv) The date the waste is accepted; and
- (3) The transporter carries this record when transporting waste to the reclamation facility; and
- (4) The transporter retains these records for a period of at least three years after termination or expiration of the agreement.

[45 FR 33151, May 19, 1980, as amended at 45 FR 86973, Dec. 31, 1980; 51 FR 10176, Mar. 24, 1986; 51 FR 28685, Aug. 8, 1986; 61 FR 16315, Apr. 12, 1996; 70 FR 10821, Mar. 4, 2005]





Metal Platers Hazardous Waste Generator Training Monday and Tuesday, September 20 and 21, 2010 9 a.m. to 1 p.m.

Stevens Steak House 5332 E. Stevens Place Commerce, CA 90040

Co-sponsored by the U.S. EPA and MFASC

Registration Form

lame:	
Company Name:	
Company Address:	
Company Phone Number:	
Company E-mail Address:	
lease mail this form, along with a check for \$40 for each participant, to the bollowing address:	ne
MFASC	
Metal Platers Training	
.O. Box 6547	
urbank, CA 91510-6547	

Checks should be made out to MFASC

T-888-253-2622 MFASC 1-800-498-7587

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SW district

Mary Meissner Duty Micer Disco Christine 909-625-6645 Evology Control

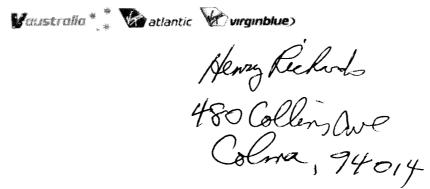
Evology Control

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It you cominge waste does it all Deume regulated Waste ?

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DTSC: HWTS Reports

HWTS EPA ID Profile

EPA ID: CAR000056473 Name: HENRYS MEDICAL

XRAY SERVICES

Status: INACTIVE /Inactive Date: 2000-06-30 Contact:

HENRY RICHARDS

County: SAN MATEO SIC: Record Entered: 2000-04-

27 Last updated: 2010-07-06

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	Name	Address	City	State	ZIP	Phone
Location	SERVICES	501 LYNBROOK DR			940440000	
Mailing		501 LYNBROOK DR	PACIFICA	CA	940440000	
Owner	HENRY RICHARDS			99		000000000
Oper/Contact	HENRY RICHARDS	INACT 00VQ FINAL NOTICE - BATCH	PACIFICA	99	940440000	6503598104

Based ONLY upon EPA ID: CAR000056473:

Calif. Manifests?	Transporter Registration?	

YES NO	NO	NO NO	
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Calif. Manifest Counts and Total Tonnage									
m = Manifest Count t=Total Tonnage									
Ship Year	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF				
1999	2 (m) 5.56690 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2001	39 (m) 8.98540 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2002	58 (m) 25.34104 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2003	17 (m) 22.68897 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2004	13 (m) 25.68720 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2005	8 (m) 15.80430 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2006	11 (m) 24.33195 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2007	5 (m) 15.59580 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)				
2008	4 (m) 10.21650 (t)	1 (m) 3.10665 (t)	0.00000	0.00000	0 (m) 0.00000 (t)				
2009	6 (m) 16.05450								

	(t)	(t)	(t)	(t)	(t)
2010	2 (m) 5.73375 (t)	0 (m) 0.00000 (t)	0 (m) 0.00000 (t)		

Waste Code By Year Matrix Report								
Calif.	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF			
RCRA	Generator	Trans. 1	Trans. 2	TSDF	Alt. TSDF			

End of Report



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